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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PHILLIP FORMAN, an individual,

Plaintiff,

v.

UNITED HEALTH PRODUCTS, INC., a Nevada
corporation; and DOUGLAS K. BEPLATE, an
individual,

Defendants.

CASE NO.: 2:19-cv-00519-CDS-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER**

(Fourth Request)

Defendants UNITED HEALTH PRODUCTS, INC. and DOUGLAS K. BEPLATE
(collectively, “Defendants”), by and through their attorneys, Alverson Taylor & Sanders, and
Plaintiff PHILLIP FORMAN, by and through his attorneys, the law firms of Marquis Aurbach and
Carmel, Milazzo & Feil, LLP, hereby stipulate as follows:

Summary of Relief Requested

This stipulation is a (fourth) request to extend the current deadline to file a Joint Pretrial
Order. Currently, the Joint Pretrial Order is due to be filed on **May 4, 2022**. The parties are
respectfully requesting a 47-day extension, so that the joint pretrial Order will become due on **June**
20, 2022.

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1 Local Rule IA 6-1(a) provides:

2 A motion or stipulation to extend time must state the reasons for the extension
3 requested and must inform the court of all previous extensions of the subject deadline
4 the court granted. . . . Immediately below the title of the motion or stipulation there
5 also must be a statement indicating whether it is the first, second, third, etc. requested
6 extension”.

7 The Joint Pretrial Order is currently due to be filed on May 4, 2022. The parties are
8 respectfully requesting an extension of 47 days, bringing the due date to June 20, 2022. This
9 deadline has been extended three times prior to this request. Since the third such extension, and on
10 the very eve of the current JPO deadline, Defendants have retained new local counsel to best
11 represent its interests in Nevada. The instant case is one involving complex factual and legal issues,
12 and new counsel for Defendants, having not been a part of this matter previously, require additional
13 time to adequately represent Defendants’ interests in preparing the Joint Pretrial Order. Defendants’
14 counsel have communicated with Plaintiff’s counsel regarding the proposed extension and were able
15 to reach an agreement. The parties have agreed to a 47-day extension, to a new deadline of June 20,
16 2022, on the condition that Defendants provide to Plaintiff their first draft of the pre-trial Order 12
17 days prior to the June 20 deadline, on Wednesday, June 8, 2022.

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Based on the foregoing, the parties respectfully request that the due date for the filing of the Joint Pretrial Order be extended forty-seven (47) days, from May 4, 2022 to June 20, 2022.

DATED this 4th day of May, 2022.

ALVERSON TAYLOR & SANDERS

CARMEL, MILAZZO & FEIL

By: /s/ Adam R. Knecht
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By: /s/ Michael D. Nacht
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IT IS SO ORDERED.

Dated this 4th day of May, 2022.



Cam Ferenbach
United States Magistrate Judge

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May 4, 2022

Via ECF

Honorable Judge Cristina D. Silva, U.S.D.J.
United States District Court for the District of Nevada
400 S, Virginia St.
Reno, Nevada 89501

Re: *Phillip Forman v. United Health Products, Inc. et al.*

Dear Honorable Judge Cristina D. Silva:

This firm represents Defendants United Health Products, Inc. and Douglas K. Besplate (collectively “Defendants”) in the above-referenced matter. We write with respect to the joint proposed pretrial order which is due for filing today.

Pursuant to this Honorable Court’s April 5, 2022 Order (ECF No. 64), the parties’ joint proposed pretrial order is due to be filed, today, May 4, 2022. Our firm, just yesterday, substituted in as counsel of record for Defendants in this matter. As such, we respectfully request enough time to review the case and prior pleadings and work toward preparing the joint pretrial order in a manner befitting adequate and fair representation of Defendants.

In recognition of this fact, Plaintiff’s counsel has agreed to stipulate to an extension of the deadline for the joint pretrial order 45 days from today and to the next business day, Monday, June 20, 2022. Plaintiff’s counsel so agrees on the condition that Defendants provide to Plaintiff their first draft of the pretrial order 12 days prior to the June 20 deadline, on Wednesday, June 8, 2022. Defendants agree to said condition and file the instant Stipulation and Order.

We appreciate the Court’s time and attention to this matter.

Very Truly Yours,

ALVERSON TAYLOR & SANDERS

/s/ Adam R. Knecht

Adam R. Knecht, Esq.